

EXHIBIT A

1
2
3
4 IN THE CIRCUIT COURT OF THE STATE OF OREGON
5 FOR THE COUNTY OF MULTNOMAH
6 COLLABORATIVE VISION LLC, an Oregon Case No. 23CV15182
7 limited liability company,
8 Plaintiff,
9
0 vs.
1 Q5ID, INC., an Oregon corporation,
2 Defendant.

Pursuant to ORCP 54 E, Q5Id, Inc. offers to allow judgment to be taken against it by plaintiff in the total amount of Two-Hundred Thousand Dollars (\$200,000.00) for Plaintiff's Count Three (the Promissory Note). This amount is inclusive of all damages and recoverable expenses to plaintiff, and exclusive/inclusive of attorney fees, costs and disbursements. In addition, plaintiff may file a petition for costs, disbursements, attorney fees up to the date of this offer, and any other allowances pursuant to ORCP 68 of which the Court will determine what is allowed and reasonably under the normal factors and statutory requirements. Defendant reserves the right to file any objections and responses.

22 / / /

23 / / /

24 //

25 //

26 //

1 If not accepted and filed within seven (7) days of the time it was served, this offer is deemed
2 withdrawn pursuant to ORCP 54 E(3).

3 This offer shall not be given in evidence at trial, nor shall the offer be mentioned during
4 trial.

5 DATED this 16th day of November, 2023 O'HAGAN MEYER PLLC

6
7 By: *s/ Bradley J. Krupicka*
8 Bradley J. Krupicka, OSB #104318
9 bkrupicka@ohaganmeyer.com
10 Alexandra K. McLain, OSB #184103
11 amclain@ohaganmeyer.com
12 *Attorneys for Defendant O5id, Inc.*

13 Plaintiff accepts this offer on this _____ day of November, 2023.

14
15 LYNCH MURPHY MCLANE LLP

16
17 By: _____
18 Peter C. Richter, OSB #711465
19 prichter@lynchmurphy.com
20 *Attorneys for Plaintiff*

CERTIFICATE OF SERVICE

I certify that I served the foregoing **OFFER TO ALLOW JUDGMENT ON COUNT THREE** on the following attorneys by the method indicated below on the 16th day of November, 2023:

Attorneys for Plaintiff:

Peter C. Richter
LYNCH MURPHY MCLANE LLP
747 SW Mill View Way
Bend, Oregon 97702
E-Mail: prichter@lynchmurphy.com
E-Mail: pmoore@lynchmurphy.com

✓ Via First Class Mail
_____ Via Federal Express
_____ Via Facsimile
_____ Via Odyssey E-File&Serve
✓ Via E-Mail

O'HAGAN MEYER PLLC

By: s/Bradley J. Krupicka
Bradley J. Krupicka, OSB #104318
bkrupicka@ohaganmeyer.com
Alexandra K. McLain, OSB #184103
amclain@ohaganmeyer.com

Attorneys for Defendant Q5id, Inc.